From: <u>Haynes, Diana - AMS</u>
To: <u>Hrdy, David</u>

Subject: RE: Foreign Use Pesticides

Date: Tuesday, February 03, 2015 8:19:36 AM

### Hi David,

Thank you. I am putting together a background for Sitra so that she can develop a ppt for the Fed/State meeting – Michelle wants to know what the "bang for the buck" is for these compounds. Once it's ready, I'd like you to take a look as I think we should both be ready to answer questions.

I'm putting together the program plan for April through June. The only change during that time is to add peanut butter. Roger Simonds' lab will test 300 samples. FYI – we've talked about already<sup>©</sup>

## Thanks, Diana

From: Hrdy, David [mailto:Hrdy.David@epa.gov] Sent: Tuesday, February 03, 2015 8:10 AM

To: Haynes, Diana - AMS

Subject: RE: Foreign Use Pesticides

Hi Diana,

Yes, we need the data. We use that data in several ways – including risk assessment, registration decisions, recommendations for various decisions, and in general residue chemistry along with BEAD data.

Thank you for the heads up, David

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From: Haynes, Diana - AMS [mailto:Diana.Haynes@ams.usda.gov]

Sent: Friday, January 30, 2015 3:24 PM

To: Hrdy, David

Subject: RE: Foreign Use Pesticides

Hi David,

## Some examples:

- Carbendazim in most everything summer squash, carrots, peaches, raspberries, apple juice...
- TBZ in nectarines
- Chlorpyrifos in carrots
- Chlorpropham in peaches
- AZM in nectarines

Those are three that stick out in Sitra's analysis so far.

# Thanks☺

#### Diana

From: Hrdy, David [mailto:Hrdy.David@epa.gov]

Sent: Friday, January 30, 2015 2:50 PM

To: Haynes, Diana - AMS

Subject: RE: Foreign Use Pesticides

Hi Diana,

In theory, we should be putting these residues into the risk assessment as PDP reports them. However, that said, I have seen where we have explicitly omitted this data. The answer then is, it depends.

We need the data to show what the risks actually are so the data are important but decisions may not be used with them all the time.

We can't do much except for when it is a risk or when it is a trade irritant.

We will use the data in the end some how or another. What are some examples, that might help me answer this question too.

David

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From: Haynes, Diana - AMS [mailto:Diana.Haynes@ams.usda.gov]

**Sent:** Friday, January 30, 2015 10:04 AM

To: Hrdy, David

Subject: Foreign Use Pesticides

Hi David,

As you know, since 2012, we've been trying to put "foreign use" pesticides into PDP – mostly in response to the OIG audit that recommended EPA, FDA and USDA work to do this.

Primarily, we've been using FDA intel of late to determine what to add — based on what FDA is seeing in imports. These may or may not have a U.S. tolerance.

If they are not registered in the U.S. and aren't going to be, what will FPA do with that data?

I am working with Sitra, one of our new chemists, to put together an update for the April meeting. She asked me this question and I was not entirely sure. I know how the data WITH registrations will be used. Will the no tolerance data be put into an associated cumulative risk cup? Other?

Thanks, Diana

## Díana Haynes, Director

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